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6 Attorneys for Defendants  
 7 The Wildcat Vineyards LLC dba  
 Sarah's Vineyard

8  
**UNITED STATES DISTRICT COURT**  
 9  
**NORTHERN DISTRICT OF CALIFORNIA**

11 ROBERTO CELESTINO, GERALDO  
 12 PACHECO, JOSE MONTEJANO AND  
 13 GERALDO M. CELESTINO, individually and  
 on behalf of others similarly situated,

14 Plaintiffs,

15 v.

16 THE WILDCAT VINEYARDS LLC DBA  
 SARAH'S VINEYARD, AND DOES 1 TO  
 17 10,

18 Defendants.

Case No. C 08 00994

CLASS ACTION

**JOINT STATUS REPORT AND  
 [PROPOSED] ORDER EXTENDING  
 DEFENDANT'S TIME TO RESPOND TO  
 PLAINTIFFS' COMPLAINT**

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 20 The parties jointly submit the following Joint Status Report:

21       A. **Ongoing Settlement Negotiations**

22       In this class action lawsuit, plaintiffs Roberto Celestino, Geraldo Pacheco, Jose Montejano  
 23 and Geraldo M. Celestino ("plaintiffs") assert that defendant The Wildcat Vineyards LLC, dba  
 24 Sarah's Vineyard ("defendant") owe them, and similarly situated employees, unpaid overtime  
 25 wages and associated penalties.

26       Ever since defendant received plaintiffs' complaint, defendant has been diligently  
 27 investigating plaintiffs' claims, reviewing its time and payroll records, and sharing with plaintiffs  
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1 such information in a good faith attempt to resolve the parties' dispute amicably and without  
2 incurring unnecessary litigation costs. The process of evaluating and negotiating a potential  
3 settlement, however, has taken a considerable amount of time, and the parties jointly request that  
4 the Court allow additional time for defendant to respond to plaintiffs' complaint in the event the  
5 parties cannot informally resolve the matter.

6       **B.     Time Frame Necessary to Resolve Matter**

7       Defendant intends to continue informally producing documents containing wage and hour  
8 information to plaintiffs, but needs until the end of May to find, review, and produce relevant  
9 records, and to sort relevant, non-privileged information from confidential information about  
10 employees that are not involved, or likely to be involved, in this lawsuit. Plaintiffs, in turn, will  
11 also need additional time to review and analyze documents provided by defendant. The parties  
12 anticipate that settlement negotiations will likely continue through the end of June.

13       **C.     Request to Extend Time for Defendant to Respond to Plaintiffs' Complaint to**  
14       **July 11, 2008**

15       The parties jointly request that the Court extend defendant's time to respond to plaintiffs'  
16 complaint to July 11, 2008 so that defendant can focus on providing plaintiffs with relevant, non-  
17 privileged documents at this pre-discovery stage in furtherance of the parties' good faith settlement  
18 negotiations. Extending defendant's time to respond to plaintiffs' complaint July 11, 2008 will not  
19 impose any extra burden on the Court, because the initial case management conference is not  
20 scheduled to take place until August 18, 2008, and will save each party unnecessary litigation  
21 expense.

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1           **STIPULATED AND AGREED.**

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3 DATED: May 15, 2008

LAW OFFICE OF ADAM WANG

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6 By: /s/ Adam Wang  
7 Adam Wang  
8 Attorneys for Plaintiffs  
9 Roberto Celestino, Geraldo Pacheco, Jose  
10 Montejano And Geraldo M. Celestino

11 DATED: May 12, 2008

COBLENTZ, PATCH, DUFFY & BASS LLP

12 By: /s/ Katherine C. Zarate  
13 Katherine C. Zarate  
14 Attorneys for Defendants  
15 The Wildcat Vineyards LLC dba  
16 Sarah's Vineyard

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18           **SO ORDERED.**

19 DATED: \_\_\_\_\_, 2008

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21           \_\_\_\_\_  
22 JUDGE OF THE SUPERIOR COURT